

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND**

M. LEO STORCH MANAGEMENT
CORP. ACTING BY AND THROUGH
MLSDC COLUMBIA LLC

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Plaintiff,

*

Civil No. 22-2867

v.

*

TRAVELERS INDEMNITY
COMPANY OF AMERICA

*

*

Defendant.

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**DEFENDANT'S STATEMENT
PURSUANT TO STANDING ORDER 2021-13**

Defendant Travelers Indemnity Company of America ("Travelers") by its undersigned counsel, files this statement pursuant to the Court's Standing Order 2021-13:

1. Date that defendant was served with summons and complaint:

Plaintiff M. Leo Storch Management Corp. acting by and Through MLSDC Columbia LLC served Travelers with process on October 6, 2022. *See* ECF No. 1, Notice of Removal, ¶ 2.

2. Diversity jurisdiction matters: Plaintiff M. Leo Storch Management Corp. acting by and Through MLSDC Columbia LLC ("Storch") is a Maryland corporation whose principal office is located in Baltimore County at 25 Hooks Lane, Suite 312, Baltimore, Maryland 21208. *See* Exhibit A, Caption (identifying Plaintiff's address in Baltimore, Maryland) and ¶ 6. Travelers, the only defendant to the State court action, is not a citizen of Maryland.

Travelers is a Connecticut corporation with its principal place of business located in Hartford, Connecticut 06183.

3. If removal takes place more than thirty days after any defendant was served:

Travelers removed the State court action to this Court on November 4, 2022, which was within 30 days of service of process. *See* ECF No. 1. As a result, there is no information responsive to paragraph 3 of this Court's Standing Order 2021-13.

4. If removal takes place where action in state court was commenced more than one year before the date of removal: The State court action was commenced by Plaintiff on or about August 30, 2022, which is less than one year before the date of removal on November 4, 2022. As a result, there is no information responsive to paragraph 4 of this Court's Standing Order 2021-13.

5. Information concerning defendants who have not joined in removal: At the time the State court action was removed, Travelers was (and remains) the only defendant named in the Complaint. As a result, there is no information responsive to paragraph 5 of this Court's Standing Order 2013-13.

Respectfully submitted,

Dated: November 4, 2022

/s/ Ezra S. Gollogly
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*Counsel for Defendant
Travelers Indemnity Company of America*

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 4th of November 2022, a copy of the foregoing Statement Pursuant to Standing Order 2021-13 was served electronically on all parties receiving service via CM/ECF in this case and was sent by first-class mail, postage prepaid, and electronic mail to:

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/s/ Ezra S. Gollogly
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